

# EXHIBIT G

**Re: Document Production****Caitlyn Silhan** to: Mackin, Anna

Cc: "Clopton, Jodie", "Martinez, Tamera", Vicki Via

Bcc: Vivian Cox-Kahey

01/17/2017 05:23 PM

Hi Anna,

We have not received the outstanding production as of the time of this email. When we spoke about the matter on Friday, you indicated that you should be able to produce it today as agreed, and in the event that you could not, would let be know in advance of the noon deadline whether you required another small extension. As you know, we need enough time to review these documents in advance of upcoming depositions, and further extending those or any other dates to accommodate production delays is not an acceptable option. Having not heard from you about the outstanding production, we will need to seek court intervention if you are unable to produce the remaining responsive documents in the next 24 hours.

With respect to the Friday, January 13 production of 913 pages of documents, you have not provided a cover letter or privilege log explaining what, if any, information you have withheld on the basis of privilege or for any other reason (including, for example, whether Social Security Numbers have been redacted and if so, for which specific documents). That production is also deficient because

- (1) you have renamed native files, which is inconsistent with our ESI protocol that requires that native file names be maintained, and requires that you provide a cross-reference list of native file names and Bates numbers corresponding with each native file (see also my November 11, 2016 email to you memorializing our discussion about this issue);
- (2) for the re-named native files, the metadata only provides the date you modified the document, not the date the document was created or edited;
- (3) you have failed to produce the Custodian field for a single document; and
- (4) of the 193 documents produced, 74 have no information for the Author and From fields.

Finally, we need the Parent\_ID field to contain the Bates\_Number of the document from which the Native file was extracted, which is standard. We continue to review the production, and I will get back to you should we identify any other issues.

Please contact me at your earliest opportunity to discuss the foregoing.

Thank you,

Caitlyn

**waterskraus****Caitlyn Silhan | Attorney**

3141 Hood Street, Suite 700 | Dallas, TX 75219

Toll Free 800-226-9880 | Phone 214-357-6244 | Fax 214-357-7252

[www.waterskraus.com](http://www.waterskraus.com)**Please note new address**

Caitlyn Silhan

Likewise, Anna. With respect to point 1, I'm confir...

01/12/2017 02:28:37 PM

From: Caitlyn Silhan/Attorney/Dallas/W&K  
 To: "Mackin, Anna" <Anna.Mackin@oag.texas.gov>,  
 Cc: "Clopton, Jodie" <Jodie.Clopton@oag.texas.gov>, "Martinez, Tamera" <Tamera.Martinez@oag.texas.gov>  
 Date: 01/12/2017 02:28 PM  
 Subject: Re: Document Production

Likewise, Anna. With respect to point 1, I'm confirming that electronic production via secure share is acceptable at this point. If that changes, I will let you know. As to point 2, I'm also confirming that we have agreed to extend tomorrow's deadline for the remaining 10,000 pages to Tuesday at noon. Let me look into point 3 and get back to you.

Best regards,

Caitlyn

**waterskraus**

**Caitlyn Silhan | Attorney**

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**Please note new address**

"Mackin, Anna"

Caitlyn, I write to confirms our conversation a few...

01/12/2017 01:26:28 PM

From: "Mackin, Anna" <Anna.Mackin@oag.texas.gov>  
 To: Caitlyn Silhan <csilhan@waterskraus.com>,  
 Cc: "Clopton, Jodie" <Jodie.Clopton@oag.texas.gov>, "Martinez, Tamera" <Tamera.Martinez@oag.texas.gov>  
 Date: 01/12/2017 01:26 PM  
 Subject: Document Production

Caitlyn,

I write to confirms our conversation a few moments ago. We agreed to the following regarding document production in Stringer v. Cascos:

1. Defendants will produce the first batch of documents to you, Vivian your paralegal, and the TCRP attorneys tomorrow. This currently numbers about 2,000 pages in Relativity. When the files are ready, Tamera will share a link to access them via secure share.
2. I will complete review of a second batch of documents before Tuesday morning (Monday is a State holiday). I have not seen this batch yet because it is still being processed by EDS, but my best estimate (subject to change) is that it is about 10,000 pages. First thing Tuesday morning I will ask EDS to process the files ASAP with the aim of providing them to you by Tuesday at noon. If EDS anticipates that the processing time will be longer than this, I will inform you immediately and give you their best estimate of the files will be ready for production. At that point, Tamera will provide them to you, Vivian, and the TCRP attorneys via secure share.
3. We discussed producing Excel files both natively and "Watermarked" (bearing a "CONFIDENTIAL" stamp), with the agreement that only the watermarked versions would be used. I just spoke with our EDS consultant, however, and he reminded me that, under the ESI agreement, we will be providing a load file with the metadata for each native file produced. Given this, would it be acceptable for us to produce watermarked files only? I'm proposing this because it might be more straightforward when it comes to bates numbering, etc.

Please let me know your thoughts on point 3, and also correct me if you had a different understanding of

our agreement regarding points 1 and 2.

Thanks, as always, for your professionalism.

Sincerely,  
Anna

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